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FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of the Commission's)
Rules Concerning Maritime)
Communications)

PR Docket No. 92-257

To: The Commission (Mail Stop 1170)

COMMENTS OF PHONIC EAR, INC.

1. Phonic Ear, Inc. ("Phonic Ear") hereby submits its

~~comments in response to the Commission's Notice of Proposed Rule~~

immediately adjacent 210-216 MHz band, and concerns about interference to television reception have always dominated consideration of proposals for the 216-217 MHz band.

3. Phonic Ear is the nation's leading manufacturer of wireless auditory assistance devices: low-power radio devices used to assist both hard-of-hearing children in school and hard-of-hearing adults (and children) in public gathering places such as theaters, auditoriums, and houses of worship. Within a few days of these Comments, Phonic Ear will file with the Commission a Petition for Rule Making proposing that the 216-217 MHz band be re-allotted to establish a new low power radio service for disability services and health care -- an area of great need which has attracted a great deal of public and governmental attention of late.

4. Phonic Ear's proposals deserve careful attention. They are unrelated to the operational needs of maritime communications users. They should be considered in a separate proceeding, where health care and rehabilitation experts may comment and contribute their ideas without becoming enmeshed in the unfamiliar and highly specialized area of maritime communications.

5. Accordingly, Phonic Ear urges that the Commission simply delete the AMTS allotment at 216-217 MHz in this proceeding, since the band is clearly not useful for AMTS, and take up alternative uses of the band in a separate docket.

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Respectfully submitted,



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